

# United States District Court

for the  
Western District of New York



United States of America

v.

Case No. 25-mj- 5052

MANUEL ALEJANDRO ESTRADA-GONZALEZ

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 20, 2025, in the Western District of New York, the defendant, an alien, having been previously deported and removed from the United States on January 10, 2019, and February 19, 2019, was found in the United States, without first having obtained permission from the Attorney General of the United States to re-apply for admission to the United States,

all in violation of Title 8, United States Code, Section 1326(a).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

*Complainant's signature*

Dean M. Mandel, Border Patrol Agent  
U.S. Border Patrol

*Printed name and title*

Sworn to before me and signed telephonically.

Date: February 25, 2025

*Judge's signature*

City and State: Buffalo, New York

HON. MICHAEL J. ROEMER  
United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

STATE OF NEW YORK    )  
COUNTY OF ERIE        )       SS:  
CITY OF BUFFALO        )

I, **DEAN M. MANDEL**, being duly sworn, deposes and states:

1. I am a Border Patrol Agent with the United States Border Patrol, within the Department of Homeland Security (DHS) and have been so employed for the past eighteen (18) years. In such capacity, my duties include investigating persons who have violated federal immigration laws and other related federal statutes, such as violations of Title 8, United States Code, Section 1326.

2. I make this affidavit in support of the annexed criminal complaint charging **MANUEL ALEJANDRO ESTRADA-GONZALEZ** (hereinafter “**ESTRADA-GONZALEZ**”), born in May 1993, an alien and citizen of Mexico, with being found in the United States without the expressed consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security, after having been deported or removed from the United States, in violation of Title 8, United States Code, Section 1326(a).

3. The statements contained in this affidavit are based upon my personal knowledge, my review of official records, and upon information provided to me by other U.S. Border Patrol Agents. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this

investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that ESTRADA-GONZALEZ did knowingly violate Title 8, United States Code, Section 1326(a).

4. On or about February 20, 2025, Buffalo Border Agent A. Arnst, was working with Border Patrol Agent B. Deland and Border Patrol Supervisory Agent M. Spear on a report of a suspected illegal alien staying at the Buffalo Airport Inn in Cheektowaga, New York, along with a description of the vehicle the suspected illegal alien was using. This information was provided to them from Border Patrol Agent A. Hurd. The agents were able to locate the suspected illegal alien's vehicle, a silver Dodge Ram with the New Jersey plate M72VDH, and then waited to see if anyone approached it. At approximately 8:25 A.M., Agent Deland observed 2 males approaching the vehicle. Agent Deland alerted Agent Spear and Agent Arnst that they were getting into the vehicle. Agents Spear, Deland and Arnst approached the 2 males and started to talk to them. While speaking with them they determined that one of the subjects had immigration status while the other, ESTRADA-GONZALEZ was ordered removed on 02/19/2019. ESTRADA-GONZALEZ was placed under arrest and transported back to Buffalo Border Patrol Station approximately around 8:48 A.M.

5. Upon arrival at the Buffalo Border Patrol Station, a complete set of fingerprints were electronically captured from ESTRADA-GONZALEZ and submitted to the Federal Bureau of Investigation ("FBI"), Identification Division, in Clarksburg, WV, via the




Integrated Automated Fingerprint Identification System (“IAFIS”). This set of fingerprints produced no positive match to anyone requesting permission to enter the United States.

6. A review of the documents contained in the Alien Registration File (A-file) for ESTRADA-GONZALEZ revealed that the defendant had been removed from the United States on two prior occasions:

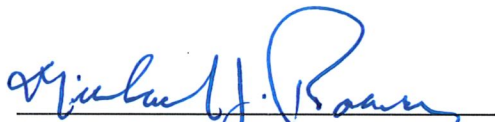
- a. On January 10, 2019, ESTRADA-GONZALEZ was ordered removed by an immigration officer, and physically departed the United States on January 10, 2019, from the Hidalgo Port of Entry pursuant to that order.
- b. At the time of his deportation on January 10, 2019, ESTRADA-GONZALEZ was provided an Immigration Form I-296, advising him that he would be in violation of Title 8, United States Code, Section 1326 if he entered, attempted to enter, or was found in the United States without the permission of the United States Attorney General, or his Successor, The Secretary of Homeland Security.
- c. On February 19, 2019, ESTRADA-GONZALEZ was apprehended by agents at the Rio Grande Border Patrol Station. ESTRADA-GONZALEZ was provided a re-instatement of his prior order of removal, and physically departed the United States on February 19, 2019, from the Brownsville-Gateway Port of Entry.
- d. At the time of his deportation on February 19, 2019, ESTRADA-GONZALEZ was provided an Immigration Form I-294, advising him that he would be in violation of Title 8, United States Code, Section 1326 if he entered, attempted to enter, or was found in the United States without the permission of the United States Attorney General, or his Successor, The Secretary of Homeland Security.

7. A further review of the A-file for ESTRADA-GONZALEZ failed to reveal that he had applied for or received requisite permission from the Attorney General or the Secretary of the Department of Homeland Security to reenter the United States.

8. Based upon the foregoing, your affiant respectfully submits that there is probable cause to believe that MANUEL ALEJANDRO ESTRADA-GONZALEZ has violated Title 8, United States Code, Section 1326(a).

Dean M. Mandel   
Dean M. Mandel, Border Patrol Agent  
U.S. Border Patrol

Sworn to me and signed telephonically  
this 25<sup>th</sup> day of February 2025.

  
HON. MICHAEL J. ROEMER  
United States Magistrate Judge